

April 13, 2007

Robert D. Scarry, Treasurer Bunge North America Inc Political Action Committee 750 First Street NE, Suite 1070 Washington, DC 20002

Response Due Date: May 14, 2007

Identification Number: C00401687

Reference: October Quarterly Report (7/1/06-9/30/06) and Year End Report

(11/28/06-12/31/06)

Dear Mr. Scarry:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. An adequate response must be received at the Commission by the response date noted above. An itemization of the information needed follows:

-Your report does not include a Schedule H1 to disclose the ratio for the allocation of certain costs. For Separate Segregated Funds and Non-connected committees, Schedule H1 must be filed in each report that discloses an allocable disbursement for administrative expenses, generic voter drives or public communications that refer to any political party, but do not refer to any clearly identified candidates.

Further, for Separate Segregated Funds and Non-connected committees, administrative expenses, generic voter drive costs and expenses related to public communications referencing any political party committee (but no clearly identified candidates) must be allocated according to a 50% flat minimum federal percentage unless the federal account elects to pay a higher cost. 11 CFR §106.7(d)(2), (d)(3) and 11 CFR §\$104.10(b)(1) and 106.6(c)

Please note, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1136.

Singerely, -

Jodi Winship

Senior Campaign Finance Analyst

Reports Analysis Division

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